

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

**NATIONAL ASSOCIATION OF BLACK
ACCOUNTANTS, INC.,**

Plaintiff,

v.

**WHITE INVESTMENTS LLC AND JOHN
DOE NOS. 1-100,**

Defendants.

Case No. 8:25-cv-02002-MJM

**PLAINTIFF VETRO BUILDING ENVELOPE LLC'S *EX PARTE*
MOTION FOR LEAVE TO TAKE DISCOVERY PRIOR TO A RULE 26(f) CONFERENCE**

Plaintiff National Association of Black Accountants ("Plaintiff"), by C. Andrew Barnes and Whiteford, Taylor & Preston, LLP, pursuant to Federal Rules of Civil Procedure 26(d)(1), and upon the attached: 1) Memorandum of Law in support of this motion; 2) Declaration of William K. Watanabe; and 3) Declaration of Eric M. Fiterman, respectfully moves for entry of an order granting it leave to serve third party subpoenas prior to a Rule 26(f) conference (the "Motion"). A proposed order is attached for the Court's convenience.

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Respectfully submitted,

/s/ C. Andrew Barnes

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-and-

William K. Watanabe (*pro hac vice, admission
pending*)

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